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8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

10 SHILLING, et al.,

11 *Plaintiffs,*

12 v.

13 DONALD J. TRUMP, in his official capacity as
14 President of the United States, et al.,

15 *Defendants.*

Case No. 2:25-cv-241

**DECLARATION OF GEIRID
MORGAN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

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17 1. I, Geirid Morgan, declare as follows:

18 2. I declare under the penalty of perjury that the foregoing is true and correct.

19 3. On February 25, 2025, I received orders to change my permanent duty station to the
20 Armed Forces Radiobiology Research Institute (AFRRI) in Bethesda, Maryland.

21 4. My duty at AFRRI would have been to serve as in a department-level leadership role,
22 which represented a major career milestone for me. Such a role is viewed as a requirement for an
23 eventual promotion to Navy Commander, and holding it would have significantly elevated my
24 chances of promotion to Navy Commander at my next eligible promotion board.

25 5. Navy Officer promotion boards are highly competitive zero-sum events where, based on
26 needs of the Navy, only a fraction of the Officers that are considered for promotion to each rank
27 each year are selected. Furthermore, there are only 15 Officers in my Navy specialty community,
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1 making our group one of the smallest and most selective specialties in the Medical Service
 2 Corps. This also means we have the fewest options for duty stations and the most competition for
 3 job roles at duty stations.

4 6. There are currently no other opportunities available within my community billet pool for
 5 a department-level leadership role that I could fill in place of the AFFRI billet, effectively
 6 making this an irreplaceable opportunity.

7 7. On March 11, 2025, I was informed that due to the pending separation from service
 8 because I am transgender, my orders to the AFFRI were being canceled.

9 8. I was told I would instead be assigned back to my previous role at the Office of Naval
 10 Research. However, I would not have a defined Navy rank-appropriate job role to occupy
 11 because my replacement is currently performing my previous role. This will negatively impact
 12 my annual performance metrics and evaluations, which in turn will adversely impact future
 13 consideration for promotions in rank.

14 9. Thus, the decision to cancel my orders to AFRRRI as a result of the DOD ban on
 15 transgender service has in effect ended my promotion prospects and Navy career progression.

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 17 DATED: March 18, 2025

Geirid Morgan
 Geirid Morgan (Mar 18, 2025 15:04 EDT)

Geirid Morgan